

Rule 21 Working Group Meeting #36 – Meeting Minutes

August 27, 2002

Pacific Gas & Electric, 1919 Webster Street, Oakland, CA

9:30 am – 4:00 pm

Scott Tomashefsky called the meeting to order. The Meeting Agenda was:

Combined Group Discussion 9:30 am to 11:00 am

- Introductions, General Housekeeping, & Next Meeting Location
- Status of Utility Rule 21 Filings (SCE/PG&E)
- Technical Group Status Report
- Xantrex Inverter Issue Continued
- Rule 21 Standard Disconnect Issue (Hess)
- FOCUS Team DG Monitoring Study Update
- The FERC ANOPR (Standardized Agreements/Procedures)

New Business:

- Tecogen Rule 21 Equipment Certification Request

Non-Technical Breakout (Rest of the Day)

- The FERC ANOPR (Standardized Agreements/Procedures)
- The Rule 21 Bin List and Strategies for Resolving Outstanding Items
- Upcoming Filing on Rule 21, Section F (Telemetry and Telemetering Equipment)
- Net Metering Issues

Technical Breakout (Rest of the Day)

Continuing Development of Supplemental Review Guidance Document

- Non-certified Equipment (Screen 3)
- SCCR requirements (Screen 7)

The meeting discussed all agenda issues, but not in the original order.

1. The next Working Group meeting will be hosted by SCE and will be held on September 24 in Fontana.
2. Utility Advice Letters have been filed on the amendments to Rule 21. SDG&E's Advice Letter was approved, and SCE's and PG&E's approval was anticipated.
3. There were comments from SCE that DG applications are running higher than last year. It was generally felt that IOUs are getting better at handling applications. Applicants are also mostly getting better at filling out Applications, but sometimes it is hit and miss as well.
4. There was some discussion on the FERC ANOPR on DG. FERC does separate small generators (20 kW to 2000 kW) from larger ones (2000 kW to 20 MW). It is currently unclear what would be FERC's jurisdiction and how it would dovetail with the IOU jurisdiction under Rule 21. Wholesale and WDAT transactions would probably fall under FERC but would IOU transactions that use transmission lines also fall under FERC? If so, would Rule 21 also apply? It was felt that the best approach would be to engage FERC in discussions with the Working Group. Another problem is that SCE has separate internal groups handling FERC and the CPUC, whereas at PG&E the same group handles both FERC and the CPUC.

5. It was decided to invite FERC to the next Working Group meeting, to engage in an open discussion and find the best solution. The FERC ANOPR calls for the formation of such Working Groups, and the California Working Group would be a good place to start.
6. The FOCUS team is planning to monitor several commercial DG sites to collect data on the interaction between the DG and the grid. This issue was discussed in previous Working Group meetings and PG&E had requested several changes to make the monitoring effort more robust. These changes have been incorporated in the program. After a slow start, several DG “customers” have now expressed an interest in offering their sites for monitoring. These include an automotive company, a major oil/convenience chain, a micro-devices company, a hospital, a Municipal Utility and two sites from an energy development company. The technologies range from microturbines to PV to larger turbines to Fuel Cells to multiple systems at a site. PG&E requested copies of the Monitoring Test Plan be provided to the group.
7. The FOCUS team has been tasked with developing a DG Interconnection Guidebook in California. PG&E is already working towards development of an Interconnection guidebook for its customers. Texas already has an Interconnection Guidebook. The FOCUS team will develop an Outline for the Guidebook, meet with PG&E and present the Outline to the Working Group for comments. The Guidebook should be user-friendly and practical and not biased either towards IOUs or developers, but should be focused on “Customer” needs.
8. There has been a new application for Certification of DG from Tecogen. With three certified systems, this application would potentially be the fourth certified system in California.
9. There was much discussion on the Xantrex letter that addressed its previous UL certification of certain Xantrex inverters that are used with PV. Recent UL tests showed that under certain unlikely circumstances, the protection provided by the inverters is reduced and could result in creation of undesirable islands. This raises the question: what action should be taken for units that were certified by UL but are now in question. IOUs are concerned that they may be held more liable for the consequences of failures resulting from “decertified” units than before. Others felt that the risk of leaving the inverters in is small.

Current Xantrex units do not have this problem. Xantrex may be interested in checking each inverter in question and the circuit where it is installed, but this is expensive. This issue was tabled for further discussion.

(Afternoon non-technical breakout):

10. Assembly Bill 2228 was unanimously passed by both state Houses and is on the governor’s desk. AB 2228 provides Net Metering benefits for energy for qualified biogas digesters below 1 MW. AB 58 addressing Net Energy Metering for a broader range of renewable energy is making its way through both Houses. There was some discussion about Net Energy Metering. The costs being collected pursuant to CPUC Order 2827 will throw more light on the costs of Net Energy Metering and the means for funding it.

11. The Bin Lists were discussed. It is planned to deal with the Section F Bin List for the rest of this year, and the remaining Bin List items next year, starting probably with Sections I and J.
12. There is a general desire to complete the Supplemental Review Guidance Document by the next meeting.

Afternoon Technical Breakout)

13. The Supplemental Review Guidance Document for each of the four screens did make some progress during the afternoon session. Several members felt that they spent most of the day discussing issues of less relevance to the technical discussion and would have preferred to spend the whole day addressing the Supplemental Review issues. It was decided to hold a special two-day Technical-only meeting to work through all the four screens and to publish the Supplemental Review Guidelines at the end of the two-day meeting. This two-day meeting is tentatively in late September or early October in San Diego. The next Working Group meeting will also be modified such that more time is available for the Technical Group to discuss Supplemental Review. All parties felt that discussions were productive and that there was an opportunity to develop a meaningful document.